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SEP 9 1998

FCC MAIL ROOM

9/1/98
DEAR SIR,
RE: FCC. BOY COMMANDER WOULD NOT
ACCEPT THIS FILE SO I DECIDED TO
MAIL IT.

THANKS,

[Signature]

10 29 AM '98



<PROCEEDING>98-143
<DATE>8/31/98
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<LAW FIRM>n
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<FILE-NUMBER>1
<DOCUMENT-TYPE>CO
<CONFIDENTIAL>n
<PHONE-NUMBER>808-9599313
<DESCRIPTION>comments requested by fcc on amateur service
rules, docket no.98-143.
<NOTIFY>kh6at@gte.net
<TEXT>Dear FCC: Ref. Improving enforcement processes.

If the FCC would transfer the 27mhz cb band to frequencies that are not ionosphere propagated it would go a long way towards eliminating malicious interference found on all hf frequencies. Most of today's hams come from that totally lawless environment and they bring the profanity, jamming, illegal call signs, illegal high power amps, and "anything goes" operating procedures with them.

I remember operating on that band as a radio amateur and the FCC monitoring stations never had any problems with the hams when that 27 mhz was the 11 meter ham band. These cb types are the very people that want to eliminate cw in the ham examinations so they will have more hf voice privileges. The FCC should have taken a portion of a vhf or shf ham band and given that to the cb service instead of the 27 mhz 11 meter band. It is not too late to do just that.

If cb were restricted to line of sight they would have no incentive to splatter the whole hf spectrum with illegal nonlinear, unfiltered amps. and profanity.

The legal ham population is taking the rap for most of the interference these characters are creating.

Reference FCC req. for comments on the telegraphy requirements.

I think the importance of telegraphy in the ham examination can't be over emphasized. The self discipline required to spend a few months learning cw will produce far more engineers in later life than the cb types that are so anxious to gain access to the more desirable hf ham bands via a "cw free" ham entrance exam.

5, 13 and 20 wpm code tests should be retained with one minute solid copy out of five minutes sent required.

I obtained my amateur license (w6wyr, now kh6at) when the entrance exam was 13 wpm cw and I went on to do weak signal

Full

our ham exams.

While working in Japan with Raytheon co. I became friends with a Japanese family and while I was there that whole family became instant hams when Japan decided to eliminate the cw test for 40 meter phone bands. My Japan friends attached exactly as much value to their accomplishment as the typical usa cb operator does to his. You have to live near Japan to appreciate the interference created by this Japanese "no code" ssb exam.

I know cw well and I find immense enjoyment chatting in that mode. Many simple stations I contact in Asia and elsewhere could never afford the expensive equipment required for ssb communications and the elimination of cw would eliminate ham radio for them.

Freedom from cb jamming combined with weak signal detection and extremely narrow bandwidth are some of the advantages of cw. I have over 150 countries confirmed on 1.8 mhz and for moon bounce and weak signal detection it is the only mode possible.

Plenty of people, including myself, were in favor of a code free license with voice privileges in the era that I faced learning 13 wpm morse. Had my cousin and I been able to obtain this type entrance license I doubt we would have gone on to become interested in electronics. Like my friends in Japan, we would have soon tired of the jabbering and jamming and given up on the hobby.

The FCC should never have turned the testing over to the amateurs. The testing should be returned to the FCC and appropriate fees should be charged to cover the FCC expense. Today the same group of people that teach ham radio to newcomers are administering the exams and they then travel back to ARRL hqs. to receive "hero" awards for the number of new hams they have created. Many of these examiners allow the applicant to write down the dots and dashes for later translation to letters. This makes a joke of the code test. It is no surprise to me that these new license holders never attempt to operate cw.

The FCC should take a look at the size of the call book listing usa hams and compare it to the worldwide ham population. What our hobby needs is quality not quantity. Ham radio advertising supports the ARRL and I can understand their desire to increase the ham population.

Reducing the examiner requirements from extra to general is only going to further water down the entrance requirements.

would have to sign W2ABC/6 when operating in Calif. to indicate his geographic location to the world. Nowadays when I hear a 2 area call he could be in Hawaii or anywhere and the FCC couldn't care less and why should the station bother to tell me where he is?

Foreign stations are dumbfounded by this deregulation because it destroyed the integrity of American callsign areas that they used for awards.

A little more FCC deregulation and the FCC will have a "code free" ssb majority of "cb types" in the ham ranks and guess what that majority will lobby for next.

The FCC will have a enforcement mess on the ham bands like they presently have on the cb band.

The above are not just my views, but the views of all the hams I have talked to that know cw and many that don't know cw.

Aloha,
Bryce A. Carr, KH6AT